

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

*In re IronNet, Inc. Securities Litigation*

Civil Action No. 1:22-cv-00449-RDA-JFA

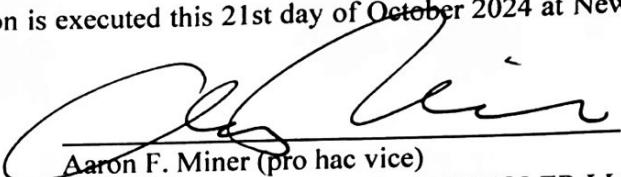
**DECLARATION OF AARON F. MINER REGARDING  
NOTICE OF CLASS ACTION SETTLEMENT PURSUANT TO 28 U.S.C. § 1715**

I, Aaron F. Miner, hereby declare as follows:

1. I am an attorney at law admitted *pro hac vice* to the United States District Court for the Eastern District of Virginia. I am a partner at Arnold & Porter Kaye Scholer LLP (“Arnold & Porter”), representing Defendants IronNet, Inc., Keith B. Alexander, James C. Gerber, and William E. Welch in this matter (collectively, “Defendants”). The facts herein are based on my own personal knowledge, or on my review of the records in this case, and if called to testify, I could and would testify competently thereto.

2. On September 27, 2024, Arnold & Porter staff acting at my direction served notice, pursuant to 28 U.S.C. § 1715, of the proposed settlement of the above-captioned class action on the officials listed in the Notice and accompanying Certificate of Service attached hereto as **Exhibit A**. In accordance with 28 U.S.C. § 1715(b), the CAFA Notice was served within ten days of the filing of the proposed settlement with the Court.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration is executed this 21st day of October 2024 at New York, New York.



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**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of October 2024, I caused the foregoing to be filed electronically using the Court's CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

/s/ Ian S. Hoffman

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# EXHIBIT A

# Arnold & Porter

September 27, 2024

**By FedEx Priority Mail**

The United States Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

All State and Territory Attorneys General  
Identified on the Attached Service List

Re: **Notice Under the Class Action Fairness Act Concerning Settlement of Litigation: *In re IronNet, Inc. Securities Litigation*, Case No. 1:22-cv-00449-RDA-JFA (E.D. Va.)**

Dear Sir or Madam:

We represent defendants IronNet, Inc. (“IronNet” or the “Company”), Keith B. Alexander, James C. Gerber, and William E. Welch (collectively, the “Individual Defendants” and with IronNet, “Defendants”), in the above-referenced matter (the “Action”). We write on behalf of Defendants to notify you of the proposed settlement in the Action pursuant to the procedures specified in the Class Action Fairness Act of 2005, 28 U.S.C. § 1715(b).

Please find enclosed a CD containing the following documents in “.pdf” format as required by the Class Action Fairness Act:

1. The Class Action Complaint, *In re IronNet, Inc. Securities Litigation*, Case No. 1:22-cv-00449-RDA-JFA (E.D. Va.), filed April 22, 2022;
2. Lead Plaintiffs’ First Amended Class Action Complaint for Violations of the Federal Securities Laws, *In re IronNet, Inc. Securities Litigation*, Case No. 1:22-cv-00449-RDA-JFA (E.D. Va.), filed August 29, 2022; and
3. The Stipulation of Settlement, including (i) Proposed Order Granting Preliminary Approval of Class Action Settlement and Providing for Notice, (ii) Proposed Notice of Pendency and Settlement of Class Action and Motion For Attorneys’ Fees And Expenses, (iii) Proof of Claim and Release Form, (iv) proposed postcard notice to class members, (v) Proposed Summary Notice of Pendency and Settlement of Class and Motion for Attorneys’ Fees and Expenses, and (vi) Proposed Order and Final Judgment, filed September 23, 2024.

Items 1-3 referenced above, as well as the other filings in the Action, may be accessed online via the Federal Public Access to Court Electronic Records (“PACER”) system, available at <http://www.pacer.gov>.

# Arnold & Porter

Please note that Defendants have entered into a Supplemental Agreement with Lead Plaintiffs that has not been filed with the district court, which provides that IronNet shall have the option to terminate the proposed settlement if proposed class members representing a certain number of shares elect to be excluded from the proposed settlement class. Defendants will provide a copy of the Supplemental Agreement upon request.

The District Court has not yet set the dates for the preliminary and final approval hearings, and has not issued a final judgment or notice of dismissal concerning the proposed settlement or the Action. Additionally, no written judicial opinions have been issued relating to the foregoing settlement materials or the materials described in 28 U.S.C. § 1715(b)(3)-(6).

At this time, Defendants do not know and cannot feasibly determine the names of the class members residing in each state, and therefore cannot feasibly estimate the proportionate share of the claims of such members to the entire settlement pursuant to 28 U.S.C. § 1715(b)(7)(A) and (B). The names and state residences of the class members in the Action will not be known until after notice of the settlement is given and potential class members submit claim forms, so it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate the proportionate share of the claims of class members residing in each state to the entire settlement.

The foregoing information is provided based on information currently available to Defendants and their counsel, and the status of the proceedings at the time of the submission of this notification.

Should you have any questions regarding this notice, the Action, or any of the enclosed documents, please contact Stephanna Szotkowski of Arnold & Porter Kaye Scholer LLP at (312) 583-2354 or [Stephanna.Szotkowski@arnoldporter.com](mailto:Stephanna.Szotkowski@arnoldporter.com).

Respectfully yours,

ARNOLD & PORTER KAYE SCHOLER LLP

*/s/ Aaron Miner*  
\_\_\_\_\_  
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